

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MARTIN SMOLOWITZ, On Behalf of Himself)
and All Others Similarly Situated,)

Plaintiff,

VS.

IBIS TECHNOLOGY CORP, and MARTIN J. REID,

Defendants.

**CIVIL ACTION
NO. 03-12613 (RCL)**

(Additional Captions Below)

**MESSRS. SMOLOWITZ, HARRISON, AND FORGUE’S MOTION FOR
LEAVE TO FILE REPLY MEMORANDUM IN FURTHER SUPPORT OF THEIR
MOTION TO BE APPOINTED LEAD PLAINTIFFS AND IN RESPONSE TO
DEFENDANTS’ LIMITED OPPOSITION TO MOVANTS’ AMENDED MOTION
FOR CONSOLIDATION, APPOINTMENT OF LEAD PLAINTIFFS, AND
APPROVAL OF LEAD PLAINTIFFS’ CHOICE OF COUNSEL**

FRED DEN, On Behalf of Himself and All Others)
Similarly Situated,)

Plaintiff,)

vs.)

IBIS TECHNOLOGY CORP, and MARTIN J.)
REID,)

Defendants.)

**CIVIL ACTION
NO. 04-10060-(RCL)**

JEFFREY WEINSTEIN, On Behalf of Himself)
and All Others Similarly Situated,)

Plaintiff,)

vs.)

IBIS TECHNOLOGY CORP, and MARTIN J.)
REID,)

Defendants.)

**CIVIL ACTION
NO. 04-10088-(RCL)**

GEORGE HARRISON, On Behalf of Himself)
and All Others Similarly Situated,)

Plaintiff,)

vs.)

IBIS TECHNOLOGY CORP, and MARTIN J.)
REID,)

Defendants.)

**CIVIL ACTION
NO. 04-10286-(RCL)**

ELEANOR PITZER, On Behalf of Herself and)	
All Others Similarly Situated,)	
)	
Plaintiff,)	
)	CIVIL ACTION
vs.)	NO. 04-10446(RCL)
)	
IBIS TECHNOLOGY CORP, and MARTIN J.)	
REID,)	
)	
Defendants.)	
)	

Martin Smolowitz, George Harrison, and Mark G. Forgue ("Proposed Lead Plaintiffs" or "Movants") hereby move this Court for leave to file their reply memorandum in further support of their Amended Motion For Consolidation, Appointment Of Lead Plaintiff And For Approval Of Lead Plaintiffs' Choice Of Counsel (*See* Docket Nos. 7 & 8) ("Movants' Application") and in opposition to Defendants' "Limited Opposition" to Movants' Application (*See* Docket No. 9).

The parties' counsel have conferred and defendants assent to this motion.

Dated: April 13, 2004

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Attorneys for Movants

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)

I hereby certify that I have conferred with defendants' counsel who assent to this motion.

/s/Theodore M. Hess-Mahan
Theodore M. Hess-Mahan